

ELIZABETH M. PIPKIN (243611)
ANN M. RAVEL (62139)
McMANIS FAULKNER
50 West San Fernando Street, 10th Floor
San Jose, CA 95113
Telephone: (408) 279-8700
Facsimile: (408) 279-3244
epipkin@mcmanslaw.com
aravel@mcmanslaw.com

MARC A. WALLENSTEIN (*pro hac vice*)
GEORGE A. ZELCS (*pro hac vice*)
RYAN Z. CORTAZAR (*pro hac vice*)
CHAD E. BELL (*pro hac vice*)
KOREIN TILLERY LLC
205 North Michigan Avenue, Suite 1950
Chicago, IL 60601
Telephone: (312) 641-9750
Facsimile: (312) 641-9751

GLEN E. SUMMERS (176402)
KARMA M. GIULIANELLI (184175)
ALISON G. WHEELER (180748)
BARTLIT BECK LLP
1801 Wewatta Street, Suite 1200
Denver, CO 80202
Telephone: (303) 592-3100

CAROL L. O'KEEFE (*pro hac vice*)
MICHAEL E. KLENOV (277028)
KOREIN TILLERY LLC
505 North Seventh Street, Suite 3600
St. Louis, MO 63101
Telephone: (314) 241-4844
Facsimile: (314) 241-3525

*Attorneys for Plaintiffs Joseph Taylor,
Edward Mlakar, Mick Cleary,
Eugene Alvis, and Jennifer Nelson*

**UNITED STATE DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

JOSEPH TAYLOR, EDWARD MLAKAR,
MICK CLEARY, EUGENE ALVIS, and
JENNIFER NELSON, individually and on
behalf of all others similarly situated.

Plaintiffs.

V.

GOOGLE LLC.

Defendant.

Case No. 5:20-CV-07956-VKD

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

Judge: Hon. Virginia K. DeMarchi

1 Pursuant to Civil Local Rule 79-5(f), Plaintiffs submit this administrative motion to
 2 consider whether another party's material should be sealed with respect to the Joint Discovery
 3 Dispute Letter and supporting attachments submitted herewith. The documents and/or portions of
 4 documents that have been designated by Defendant Google LLC as "Confidential" or
 5 "Confidential-Attorney's Eyes Only" pursuant to the Stipulated Protective Order entered on
 6 August 6, 2024 (ECF 107) in this matter, or which incorporate or rely upon documents so
 7 marked, and which Plaintiffs seek to provisionally file under seal, are listed below:

Document	Portions to be Sealed
Joint Discovery Dispute Letter	Document in its entirety
Attachment A [Excerpt of Plaintiffs' 1st RFPs]	Document in its entirety
Attachment B [Excerpt of Google Responses to Plaintiffs' 1st RFPs]	Document in its entirety

16 Pursuant to Civil Local Rule 79-5(d), Plaintiffs provisionally file under seal unredacted
 17 copies of these materials. Plaintiffs provide notice to Google that these materials will be placed
 18 in the public court file unless Google timely files its statement and/or declaration in support of
 19 sealing. *See* Civil Local Rules 79-5(f)(3); 79-5(c)(1). Plaintiffs reserve the right to oppose any
 20 submission Google makes under Civil Local Rule 79-5(f)(3). *See* Civil Local Rule 79-5(f)(4).

1 Dated: November 14, 2024

Respectfully submitted,

2
3 KOREIN TILLERY LLC

4 */s/ Chad E. Bell*
5

6 Marc A. Wallenstein (*pro hac vice*)
7 George A. Zelcs (*pro hac vice*)
8 Ryan Z. Cortazar (*pro hac vice*)
9 Chad E. Bell (*pro hac vice*)
KOREIN TILLERY LLC
205 North Michigan Avenue, Suite 1950
Chicago, IL 60601
Telephone: (312) 641-9750
Facsimile: (312) 641-9751

10 Carol L. O'Keefe (*pro hac vice*)
11 Michael E. Klenov (277028)
12 KOREIN TILLERY LLC
13 505 North Seventh Street, Suite 3600
14 St. Louis, MO 63101
15 Telephone: (314) 241-4844
16 Facsimile: (314) 241-3525

17 Glen E. Summers (176402)
18 Alison G. Wheeler (180748)
19 Karma M. Giulianelli (184175)
20 BARTLIT BECK LLP
21 1801 Wewatta Street, Suite 1200
22 Denver, CO 80202
23 Telephone: (303) 592-3100

24 Elizabeth M. Pipkin (243611)
25 Ann M. Ravel (62139)
26 McMANIS FAULKNER
27 50 West San Fernando Street, 10th Floor
28 San Jose, CA 95113
Telephone: (408) 279-8700
Facsimile: (408) 279-3244

Attorneys for Plaintiffs
Joseph Taylor, Edward Mlakar, Mick Cleary,
Eugene Alvis, and Jennifer Nelson